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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

FRESH MIX, LLC

Plaintiff,

vs.

PISANELLI BICE, PLLC, et al.,

Defendant(s).

Case No: 2:24-cv-00397-JCM-NJK

**STIPULATION (AND ORDER) TO**  
**EXTEND TIME FOR PLAINTIFF TO**  
**RESPOND TO MOTION TO DISMISS**

**FIRST REQUEST**

Pursuant to LR IA 6-1 of the Local Rules of Practice for the United States District Court, District of Nevada, the parties, by and through their attorneys, stipulate and agree to extend time in which to file Plaintiffs' Opposition to Defendants' Motion to Dismiss (Doc. No. 34). The Motion was filed on April 10, 2024 and the Opposition is due on April 24, 2024. The parties stipulate and request an extension of time for Plaintiffs to file the Opposition to Motion to Dismiss on or before May 8, 2024.

1 This is the first stipulation and not being done for purposes of delay. Defendants Pisanelli  
2 Bice, James Pisanelli, Debra L. Spinelli, and Ava Schaefer have filed a Motion to Dismiss  
3 that raise various legal arguments. Plaintiff's counsel needs additional time to respond to the  
4 many legal issues raised in the Defendants' motion.

5 The parties herein stipulate and agree that this Court may enter an Order for Plaintiff's  
6 Opposition to Motion to Dismiss would be due on or before May 8, 2024.

7 DATED this 23<sup>rd</sup> day of April 2024.

DATED this 23<sup>rd</sup> day of April 2024.

8 **MATTHEW L. SHARP, LTD.**

**CAMPBELL & WILLIAMS**

9  
10 /s/ Matthew L. Sharp  
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14 *Attorney for Defendants Pisanelli Bice, PLLC,*  
15 *James P. Pisanelli, Debra L. Spinelli,*  
16 *And Ava Schaefer*

17  
18 **ORDER**

19 **IT IS SO ORDERED.**

20  
21   
22 UNITED STATES DISTRICT JUDGE

23 DATED: April 24, 2024  
24  
25  
26  
27  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of MATTHEW L. SHARP, LTD., and that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to:

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*James P. Pisanelli, Debra L. Spinelli,*  
*And Ava Schaefer*

DATED this 23<sup>rd</sup> day of April 2024.

/s/ Cristin B. Sharp  
An Employee of Matthew L. Sharp, Ltd.